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香港觀鳥會
THE
HONG
KONG
BIRD
WATCHING
SOCIETY

Since 1957 成立

19 Jul 2014

Dear Director,

**Comments on the Expansion of Hong Kong International Airport into a
Three-Runway System – Environmental Impact Assessment Report
(EIA-223/2014)**

The Hong Kong Bird Watching Society (HKBWS) would like to raise an objection on the Expansion of Hong Kong International Airport (HKIA) into a Three-Runway System (3RS). Our reasons are stated below:



國際鳥盟成員

1. Concerns on construction works adjacent to Sha Chau egretty

Sha Chau Egretty is the second largest egretty in Hong Kong in 2013. Eighty-three nests were recorded at Sha Chau Egretty last year, making up 10.9% of the total number of nests in Hong Kong. This colony is comprised of Black-crowned Night Heron (*Nycticorax nycticorax*), Little Egret (*Egretta garzetta*) and Great Egret (*Ardea modesta*)¹. Under the project, the area next to the egretty has been proposed as the daylighting location for the Horizontal Directional Drilling (HDD) (Figure 1). Although mitigation by the means of avoiding ardeid's breeding season and works during the night time have been proposed in the EIA report, in the event of an emergency HDD related construction works on Sheung Sha Chau Island will have to be carried out.

In view of the sensitivity of ardeids to human disturbances and activities especially during their breeding season, should such contingency plan take place ecological monitoring should be carried out daily for the entire duration of the construction. Breeding egrets are susceptible to disturbance by human activity, which may lead to abandonment of their breeding areas or nestlings. The EIA report has failed to address the need for ecological monitoring during emergency situations. Any abnormal behaviors should be monitored and the number of active nests should be

¹ Egretty Counts in Hong Kong, with particular reference to The Mai Po Inner Deep Bay Ramsar Site – Summer 2013 Report

surveyed daily to monitor potential abandonment of nests. This should be added into the EM&A manual and added to the Environmental Permit (EP) as a permit condition.

2. Loss of marine habitats from 3RS reclamation and concurrent projects

The tentative schedule for the construction of the 3RS from 2015 to 2023 overlaps with the construction phase of the Hong Kong-Zhuhai-Macao Bridge Boundary Crossing Facility (HKZMB BCF), Hong Kong Link Road (HKLR) and Tuen Mun-Chek Lap Kok Link (TMCLKL), which would continue until 2016 (Figures 2 - 4) (Table below). There is also the possibility of overlapping construction period with the Sunny Bay development, which consists of approximately 80 ha of reclamation works. Based on the information extracted from the EIAs of these projects, for the first four years (2015-2018) of 3RS's construction, there will be concurrent reclamation projects taking place (Table below). **For the duration for two years (2015-2016), the marine habitat loss at north Lantau waters (including temporary and permanent) from these projects amounts to 1,991.3 ha². Between 2017 and 2018, the loss would be 1,771.3 ha³.** This is a significant amount of habitat loss for Chinese White Dolphins (CWD) all of which is concentrated in the North Lantau Waters. It is likely that CWDs will completely avoid the North Lantau Waters, just as they have been avoiding areas near the HKZMB BCF construction areas. Since the commencement of the HKZMB BCF reclamation work, the density of CWD in that area has been reduced⁴ (Figure 6). **The total permanent loss of marine habitats from all five projects amounts to 854.7 ha. The 3RS alone is responsible for 76%⁵ of this total area.**

Project	Temporary loss of marine habitat (ha)	Permanent loss of marine habitat (ha)	TOTAL*	Construction Phase								
				2011	2012	2013	2014	2015	2016	2017	2018	2018 -2023
3RS	981	650	1631					x	x	x	x	X
TMCLKL	92.6	47.7	140.3	x	x	x	x	x	X	x	X	
HKLR	37	27	64		x	x	x	x	X			
HKZMB BCF	26	130	156	x	x	x	x	X	x			

² 1,600 ha from 3RS; 140.3 ha from TMCLKL; 64 ha from HKLR; and 364 ha from HKZMB BCF.

³ 1,600 ha from 3RS; 140.3 ha from TMCLKL.

⁴ Hong Kong Cetacean Research Project: Monitoring of Marine Mammals in Hong Kong Waters (2013-14) Final report.

⁵ 650 ha from 3RS / 854.7 total ha

Project	Temporary loss of marine habitat (ha)	Permanent loss of marine habitat (ha)	TOTAL*	Construction Phase								
				2011	2012	2013	2014	2015	2016	2017	2018	2018 -2023
Sunny Bay Reclamation	Not available	80	>80							?	?	?

*Total = temporary loss + permanent loss

3. Designation of Marine Park as a compensatory mitigation measure

The proposal of designating a 2,400 ha Marine Park (MP) after the completion of reclamation works as a comparable compensate for habitat loss for CWD is not considered feasible at this stage.

The feasibility of designating a MP of such a significant size has not been studied. Designation of MP is a complicated process which involves a wide range of stakeholders of different/conflicting interests including government departments (i.e. Marine Department, Agriculture Fisheries and Conservation Department), fishermen organizations, green groups, boat operators, relevant district councils, advisory bodies and community groups. Past examples of conflicts between different stakeholders and sectors have led to either a reduction in size of the originally proposed MP or the failure of designation.

Brothers Islands Marine Park

The designation of Brothers Islands MP (BIMP) is an example of this, where the original proposed boundary for BIMP was deemed unfeasible after constraint mapping from the Preliminary Study was conducted. This resulted in a size reduction of the MP due to the presence of Urmston Road, a busy route for high-speed ferries (Figure 6). The HKZMB BCF EIA was approved in 2009 and construction began in 2011. Currently, the reclamation works for HKZMB BCF has already began but the Detailed Study for the BIMP has yet to be completed. Without the completed Detailed Study the plan cannot be submitted under the Marine Parks Ordinance Cap. 476 (MPO). Once submitted into the MPO, there will be opportunities for the public and the Chief Executive to make comments/objections.

This is an example of, “destroy first, conserve later” where the conservation

promises made from the early stages of the development proposal are still not solidified but destruction has already been taken place.

Southwest Lantau Marine Park and Soko Islands Marine Park

Another example of failed MP designation is that Southwest Lantau MP and Soko Islands MP where preliminary boundaries had been drawn up and consultation with stakeholders had begun to take place back in 2002. The proposed marine parks were expected to be designated in early 2003. However, during the consultation stage, fishermen organizations, Tai O Rural Committee and the South Lantau Rural Committee objected the proposal on the basis that the designation of the new MPs would further reduce the fishing grounds in Hong Kong waters⁶. The pressure from these objecting groups has led to the unsuccessfulness of designation. More than ten years later, these plans have not made any progress and it is still unclear as to whether Government will initiate following through this process.

Uncertainties in the promises from Airport Authority Hong Kong

Based on the lesson learnt from these previous cases, we have reservations about the successfulness of AAHK's proposal to designate a massive MP of 2,400 ha. Given the potential constraints that are still unknown at this stage, it would be impractical to assume that all 2,400 ha of the proposed MP will be successfully designated.

The process of designing and designating a MP (before the plan is submitted under the MPO), is to carry out a Preliminary Study first. During this study, constraint mapping is done where no-go areas i.e. ferry routes are identified. The Preliminary Study is then followed by a Detailed Study, where consultation with stakeholders take place including Fishermen Association, relevant district councils, community groups and green groups. **It is not until the completion of the Detailed Study that the final boundary of the MP is determined⁷. The AAHK has not completed the Detailed Study for the proposed MP, their promise of providing a 2,400 ha MP is not supported by any feasibility studies.** It is possible the final boundary that is submitted under the MPO will be significantly reduced, similar to the situation with BIMP. A conservative approach should be adapted where the success of designating the MP is confirmed prior to the commencement of reclamation works.

⁶ HK Gov't Press Release LCQ21: Marine Parks. 13 November 2013
<http://www.info.gov.hk/gia/general/201311/13/P201311130295.htm>

⁷ ACE Paper 17/2011, Proposed Marine Park in the Brothers Islands

4. Modelling data for noise, air and water quality impact assessment

We strongly urge the EPD to verify the credibility of these modelling results by re-conducting the modelling process. The modelling criteria should be done with conservative assumptions. This means that air quality impact assessment should be done by using the current pollution levels of the Pearl River Delta Region. The assumption used in the current EIA report assumes that the Government's targets for pollution reduction of the Pearl River Delta will have already been met. The results from this analysis is not based on the current pollution trend, thus making it unrealistic.

We stress the importance of these modelling data as it will not only be used for the assessment for the 3RS, but will also serve as literature review information for future development projects. Should the current data not be representative, results from impact assessments of future projects would underestimated.

The HKBWS respectfully requests the Environmental Protection Department to reject this project.

Yours faithfully,



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Hong Kong Bird Watching Society

cc:

Conservancy Association
Designing Hong Kong
Friends of Earth
Green Power
Green Sense
Greeners Action
Hong Kong Dolphin Conservation Society
Kadoorie Farm and Botanic Garden
WWF – Hong Kong

Figure 1

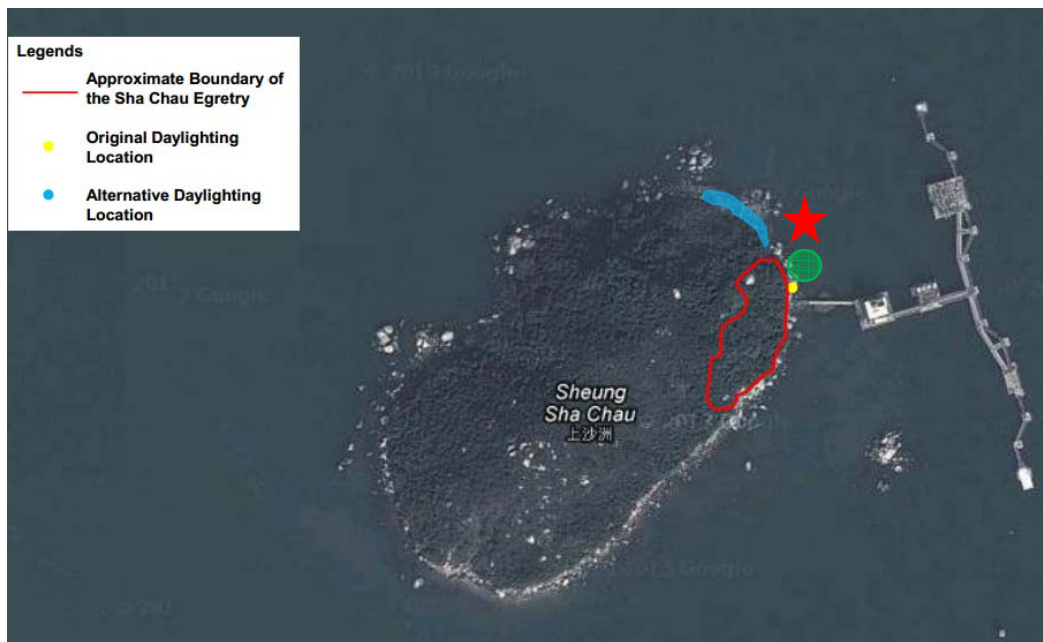


Figure 2 – Habitat loss from 3RS reclamation

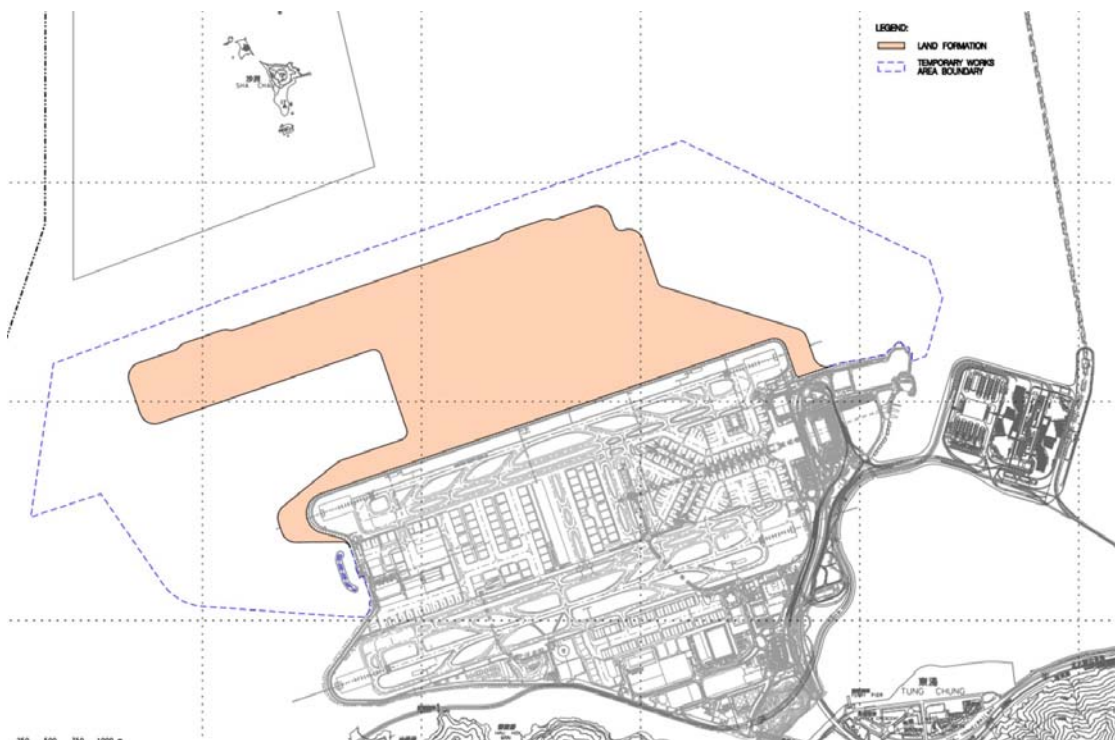


Figure 3 – Habitat loss from HKZMB BCF reclamation

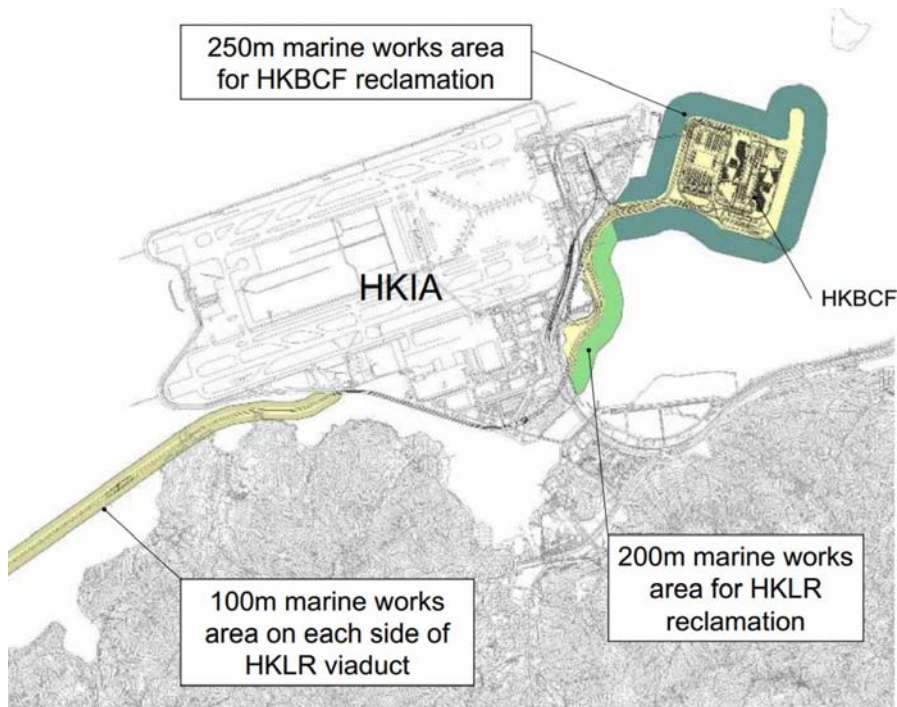


Figure 4 – Habitat loss from TMCLKL

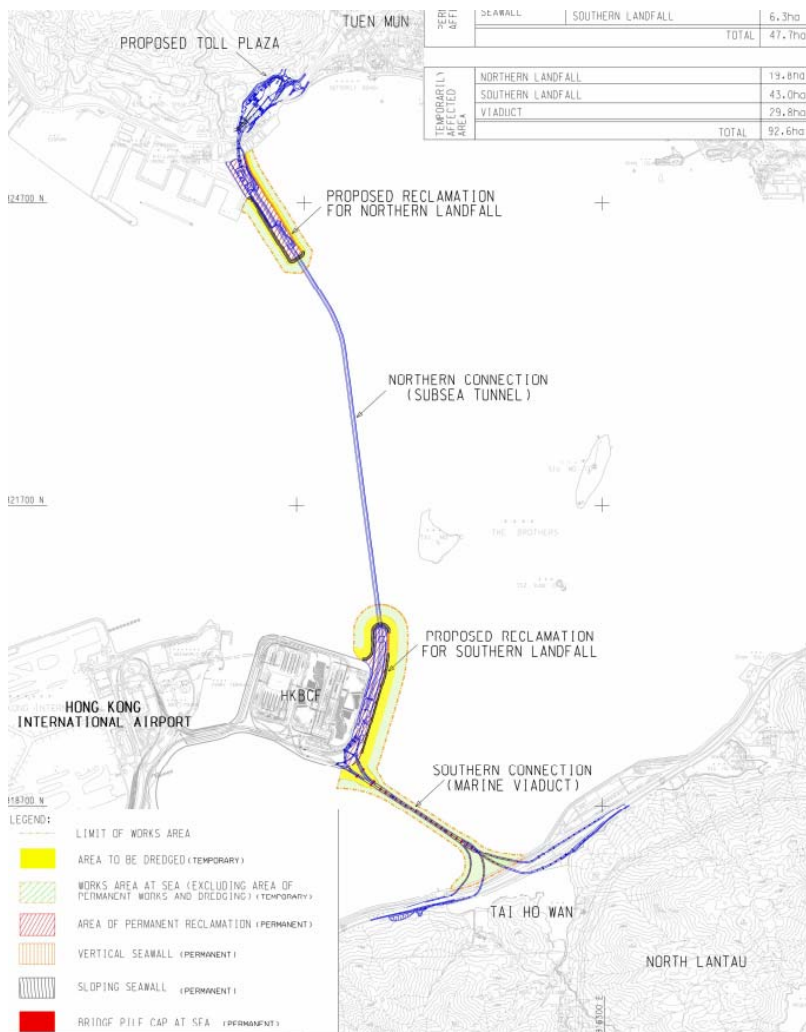


Figure 5 – Distribution of CWDs over the past few years

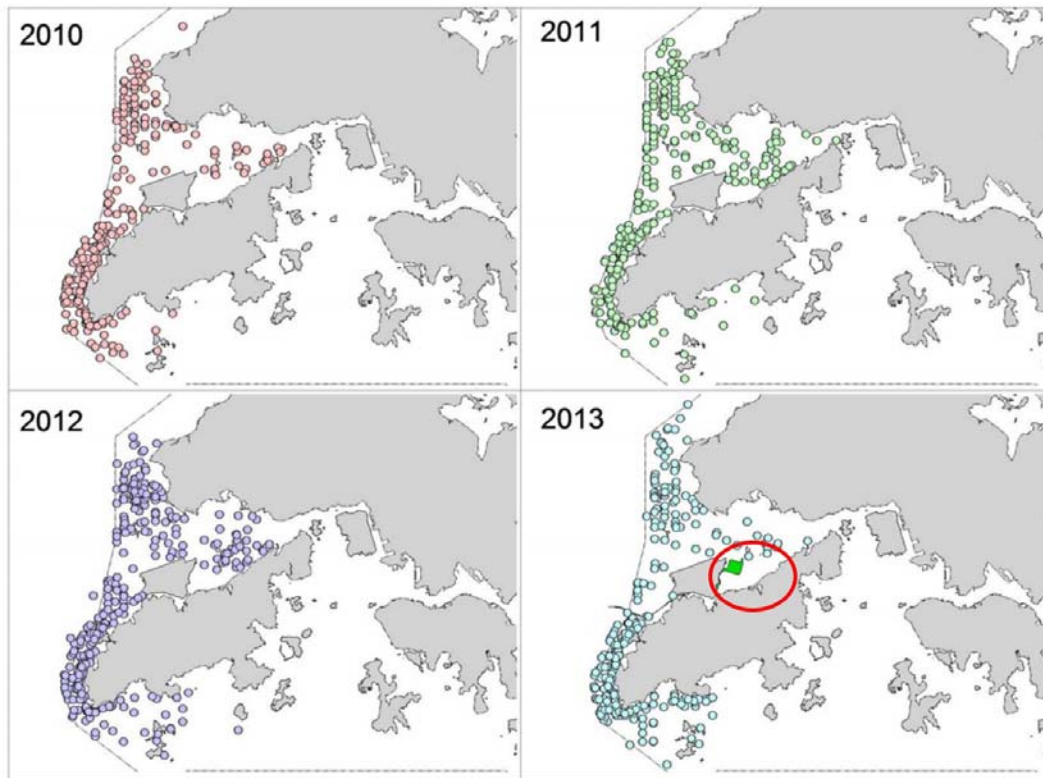


Figure 10. Comparison of annual dolphin distribution patterns from the past 4 years using AFCD monitoring data

Figure 6

